

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the matter of)	
)	
Amendment of Part 97 of the Commission's)	RM-11306
Rules Governing the Amateur Radio Service)	

Reply to Comments by Richard Hacker AH6QK

This comment is being filed in regard to a Partition for Rule Making as filed by the American Radio Relay League (ARRL), proceeding RM-11306.

I would like to reply to Mr. Hackers comments, many of which I feel have no bearing on the proceedings, that involve the Amateur Radio Service.

In the section titled "BACKGROUND AND INTRODUCTION", Mr. Hacker describes himself as a Mariner, and how he has used various Amateur service modes to maintain his safety and well being on the High Seas. He also comments on the efficiency of the Winlink 2000 messaging system. While Amateur Radio is indeed a good use for emergency communications, Mr. Hacker fails to point out the fact that many commercial HF marine channels are available, along with systems like SailMail (www.sailmail.com) to contact land-based family and for general email usage.

Indeed, current FCC regulations are very specific, that Amateur Radio is not to be used to avoid using commercial systems. Yet it would seem, that the Amateur Radio Service is indeed being promoted as a free method for routine communications, while commercial services, and FCC marine frequencies are available for this use. In that there would seem to be sufficient space at present, for these Amateur Radio email systems, that may include questionable activity, I fail to see the need to open entire HF bands to Email services.

In that Winlink and SCS Pactor II and III, promote protocols that try to hide the actual content on the system, it is easy to see how hard it would be for the FCC or the Amateur Radio Community to police this usage. If fact, any Amateur Radio Station that wants to police the bands, and read the content of these Pactor II & III transmissions will need to purchase an SCS unit, that costs \$1000 or more. The SCS company in Germany has refused to publish the protocol, that would allow the Amateur Community to write software for use with a simple PC and soundcard, and allow us to police our bands, for illegal content.

Whether this is legal or not is for you to decide, but you can certainly see how impossible it is for us to Self-Police these Winlink and Pactor II & III Transmissions, as few Amateur stations have anyway to decode the signals.

On the subject of the need for wider bandwidth, many have pointed out that on HF, Pactor III uses 5 times the bandwidth, yet only produces twice the character per second performance. In that Pactor III is considered the best protocol for digital, this certainly doesn't make the case for wider digital bandwidth limits.

In the section titled "DISCUSSION", Mr Hacker implies that somehow, the Commission show set aside any comments opposed to RM-11306 because of negative comments on Internet Forums. Certainly, I believe that free speech is still part of the US Constitution, and to support such a request, would be no different then overturning a legal election, if the winning candidate was supported by the news media.

In fact, I find the opposition to RM-11306 on the Internet Forums, in line with the 800 plus official comments that I have read on the FCC site.

I also take issue with Mr. Hacker and the ARRL's assertion that we are just beginning to provide high speed digital technologies to the Amateur service. There are no high speed digital technologies on HF. The limits on HF of bandwidth, noise, fading, and phase shift, are the limiting factors, and changing the regulations will not change that reality.

Indeed, there are no technical papers that support this theory that major speed improvements are coming to HF in digital communications. It is pure speculation, which is only supported by comparisons to new technologies that are used up in the GHz frequencies that have huge amounts of bandwidth available. You can not compare the two, as they are entirely different. We should not make major changes without any data to support them.

Again, I request that the FCC set aside RM-11306. It is a very bad plan that is not supported by technology, or by the majority of the Amateur Radio Community.

Thank you for considering my comments,

Robert J Stonesifer
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